

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

BENEFICIAL INNOVATIONS, INC.,	§	
	§	
Plaintiff,	§	
	§	2:09-cv-00175-TJW
v.	§	
	§	
COMCAST CORPORATION, THE DALLAS	§	
MORNING NEWS, INC., DIGG, INC., DISNEY	§	JURY DEMANDED
ONLINE, THE WALT DISNEY COMPANY,	§	
EBAUM'S WORLD, INC., FACEBOOK, INC.,	§	
GOOGLE INC., IAC SEARCH & MEDIA, INC.,	§	
MORRIS COMMUNICATIONS COMPANY, LLC,	§	
NBC UNIVERSAL, INC., THE NEW YORK TIMES	§	
COMPANY, YOUTUBE, LLC,	§	
	§	
Defendants.	§	
	§	

**PLAINTIFF BENEFICIAL INNOVATIONS, INC.'S SECOND AGREED MOTION  
FOR EXTENSION OF TIME FOR DEFENDANTS DISNEY ONLINE AND  
THE WALT DISNEY COMPANY TO ANSWER, MOVE, OR  
OTHERWISE RESPOND TO AMENDED COMPLAINT**

Plaintiff Beneficial Innovations, Inc. ("Beneficial Innovations") moves the Court to extend the time for Defendants Disney Online and The Walt Disney Company ("the Disney entities") to answer, move, or otherwise respond to Beneficial Innovations' Amended Complaint for Patent Infringement.

This suit was filed on June 1, 2009. The Amended Complaint adding the Disney entities was filed on September 4, 2009. On October 6, 2009, the Court granted a Motion for Extension of Time to Answer that extended the answering deadline to November 5, 2009. Counsel for the Disney entities have requested another extension of time to respond to the Amended Complaint until December 4, 2009, without waiving the Disney entities' defenses or any matters that might be presented pursuant to Rule 12(b) of the Federal Rules of Civil Procedure or any other rule or law.

Accordingly, on behalf of the Disney entities and itself, Beneficial Innovations requests that the Court extend the time for the Disney entities to respond to the First Amended Complaint to December 4, 2009, without waiving the Disney entities' defenses or any matters that might be presented pursuant to Rule 12(b), Fed. R. Civ. Proc. or any other rule or law. A proposed order granting the requested extension is attached for the Court's convenience.

Dated: October 28, 2009

Respectfully submitted,

By: /s/ Julien A. Adams

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ATTORNEYS FOR PLAINTIFF,  
BENEFICIAL INNOVATIONS, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 28th day of October, 2009. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ Julien A. Adams

Julien A. Adams